# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

# **FORM SD**

**Specialized Disclosure Report** 

# INTUIT INC.

(Exact Name of Registrant as Specified in its Charter)

Delaware (State or other Jurisdiction of Incorporation or Organization) 000-21180 (Commission File Number) 77-0034661 (I.R.S. Employer Identification No.)

#### 2700 Coast Avenue Mountain View, CA 94043

(Address of Principal Executive Offices) (Zip Code)

#### **Tyler Cozzens**

# Vice President, Deputy General Counsel

(650) 944-5574

(Name and telephone number, including area code, of the person to contact in connection with this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☑ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

#### **Section 1 - Conflict Minerals Disclosure**

# Items 1.01 and 1.02 Conflict Minerals Disclosure and Report; Exhibit

#### Conflict Minerals Disclosure

A copy of Intuit Inc.'s Conflict Minerals Report for the year ended December 31, 2018 is filed as Exhibit 1.01 hereto and is publicly available at <a href="http://www.intuit.com/company/strategic-sourcing/supplier-policies/conflict-minerals/">http://www.intuit.com/company/strategic-sourcing/supplier-policies/conflict-minerals/</a>.

#### **Section 2 - Exhibits**

#### **Item 2.01 Exhibits**

The following exhibit is filed as part of this report:

Exhibit 1.01 - Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

# **SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, the Registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Date: May 28, 2019 INTUIT INC.

By: /s/ MICHELLE M. CLATTERBUCK

Name: Michelle M. Clatterbuck Title: EVP and Chief Financial Officer

#### Intuit Inc.

#### **Conflict Minerals Report**

### For The Year Ended December 31, 2018

#### **Conflict Minerals Rule**

This Conflict Minerals Report (the "CMR") of Intuit Inc. ("Intuit") for the year ended December 31, 2018 is presented to comply with Rule 13p-1 ("Rule 13p-1") under the Securities Exchange Act of 1934, as amended (the "1934 Act"). Rule 13p-1 imposes certain reporting obligations on U.S. Securities and Exchange Commission ("SEC") registrants that manufacture or contract to manufacture products containing certain minerals which are necessary to the functionality or production of those products. These minerals are cassiterite, columbite-tantalite (coltan), gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten ("3TG" or "Conflict Minerals"). Rule 13p-1 focuses on 3TG originating from the Democratic Republic of Congo ("DRC") and nine adjoining countries (together, the "Covered Countries"). If, based on a Reasonable Country of Origin Inquiry ("RCOI"), a registrant has reason to believe that any of the necessary Conflict Minerals contained in its products may have originated in the Covered Countries and may not be from recycled or scrap sources, then the registrant must exercise due diligence on such Conflict Minerals' source and chain of custody.

#### **Company overview**

Intuit helps consumers, small businesses and the self-employed prosper by delivering financial management and compliance products and services. Our flagship brands, QuickBooks and TurboTax, help customers run their small businesses, pay employees and bills, separate business and personal expenses, track their money, and file income taxes ("Core Products"). Intuit's Core Products account for majority of our total annual revenue. These offerings include software products distributed through downloading, cloud-based services and CDs. In addition to these core software offerings, Intuit also contracts to manufacture a bluetooth card reader that connects to smart phones, tablets and bluetooth card readers and allows merchants to process credit card payments (the "Intuit Payment Devices").

#### **Conflict Minerals Rule Applicability**

Intuit has reviewed the products it manufactures or contracts to manufacture and has confirmed that none of its Core Products described above contain Conflict Minerals. For the 2018 reporting period, the Intuit Payment Devices are the only products that Intuit contracted to manufacture which contain Conflict Minerals that are necessary to their functionality or production. This Conflict Minerals Report ("CMR") relates to the due diligence process undertaken for the Intuit Payment Devices.

Intuit contracts to manufacture the Intuit Payment Devices with one direct supplier (the "Tier One Supplier"). Intuit does not directly purchase raw minerals, including 3TG, and is many steps removed from the mines, smelters and refiners that supply the conflict minerals contained in the Intuit Payment Devices.

Statements in this CMR are based on our due diligence activities performed in good faith for the calendar year 2018. Factors that could affect the accuracy of the statements in this CMR include but are not limited

to, incomplete supplier or smelter data available through suppliers or smelters, on-going certification of smelters, continued guidance or amendments to the Conflict Minerals Rule and other factors.

#### **Reasonable Country of Origin Inquiry**

Intuit conducted a RCOI to determine whether any of the necessary Conflict Minerals in the Intuit Payment Devices originated in the Covered Countries, or were Conflict Minerals from recycled or scrap sources by surveying our supply base for the Intuit Payment Devices. Based on its RCOI, Intuit was unable to determine that such Conflict Minerals did not originate in the Covered Countries or came from recycled or scrap sources, and, accordingly, we conducted due diligence on the source and chain of custody of such Conflict Minerals, as discussed below.

#### **Due Diligence Program**

Intuit's due diligence program was designed to conform, in all material respects, to the five-step framework laid out in the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition and related Supplements on Tin, Tantalum and Tungsten and on Gold (the "OECD Guidance"). Below is a summary of the design of our due diligence program as it relates to the five-step framework under the OECD Guidance.

#### Step 1: Establish Strong Company Management Systems

Intuit has established strong company management systems relating to conflict minerals. In January 2013, we formed a dedicated working group comprised of subject matter experts within the Supply Chain organization and Legal teams, and this working group has met regularly since its formation. The working group reports regularly on progress to a disclosure committee of senior executives, including the Chief Financial Officer, Chief Accounting Officer and General Counsel, and also updates the Audit and Risk Committee of the Board of Directors. Management has also developed a Conflict Minerals Policy that is posted at <a href="http://www.intuit.com/company/strategic-sourcing/supplier-policies/conflict-minerals/">http://www.intuit.com/company/strategic-sourcing/supplier-policies/conflict-minerals/</a> to clearly communicate Intuit's commitment to developing and maintaining a conflict free mineral supply chain to its suppliers and the public.

In addition, in order to improve on the quality of information provided by its supply chain, Intuit has already amended its agreements with its suppliers to strengthen the contractual requirements to source from certified conflict-free sources wherever possible. Intuit requires the inclusion of similar provisions in its agreements with new suppliers.

Finally, we maintain a company-level grievance mechanism, as described in our Code of Conduct and Ethics, that enables employees to report concerns, including any concerns regarding Intuit's Conflict Minerals supply chain. Intuit also maintains an integrity hotline that third parties can use to report on financial and ethical issues, including issues concerning our Conflict Minerals supply chain. The number for this hotline is 1-877-379-3939.

#### Step 2: Identify and Assess Risk in the Supply Chain

Intuit relies on the Tier One Supplier to provide information regarding the 3TG contained in our products, and the Tier One Supplier is similarly reliant upon information provided by its suppliers. In this process, Intuit used the due diligence tools developed by the Responsible Minerals Initiative ("RMI"), including the RMI's Conflict Minerals Reporting Template (the "Template"), which is designed to identify the

smelters that process the Conflict Minerals in a company's supply chain.

Intuit reviewed the Templates provided by the Tier One Supplier for completeness, accuracy and consistency. Intuit compared the identified smelters against the RMI's standard smelter list and the list of compliant smelters published by the Responsible Minerals Assurance Process ("RMAP").

We are a member of the Responsible Business Alliance ("RBA") and the RMI working groups. As a member of RMI, a leading industry program that helps its members to manage risk by improving supply chain transparency with respect to Conflict Minerals, Intuit has access to RMI RCOI data that aids us in determining the mine or location of origin of the Conflict Minerals in our supply chain.

#### Step 3: Design and Implement a Strategy to Respond to Identified Risks

Intuit's strategy to respond to the identified risks in its supply chain focuses on implementing requirements that its Tier One Supplier source the components in the Intuit Payment Devices from smelters certified under RMAP wherever possible. In this regard, where Template responses indicate that suppliers are not using certified conflict-free sources, we engaged with the Tier One Supplier and/or Original Equipment Manufacturer ("OEM") to encourage them to establish an alternative source of Conflict Minerals. Intuit holds regular meetings with its Tier One Supplier to discuss and assess whether all of the suppliers in the supply chain are diligently working to get the Template completed in an accurate and timely manner. We also update our Audit and Risk Committee atleast annually on our conflict minerals reporting.

#### Step 4: Support Independent Third-Party Audit of Supply Chain Due Diligence

Intuit does not have direct relationships with smelters and is many steps removed from the mines, smelters and refiners. We do not perform direct audits of these entities' supply chains for 3TGs. However, Intuit supports the development of, and smelters' participation in, independent third party audits of smelters' sourcing practices, such as the RMAP.

#### Step 5: Report on Supply Chain Diligence

Intuit is committed to full and transparent disclosure of its efforts to facilitate the sourcing of conflict-free minerals for its products. This CMR is available on Intuit's website at <a href="http://www.intuit.com/company/strategic-sourcing/supplier-policies/conflict-minerals/">http://www.intuit.com/company/strategic-sourcing/supplier-policies/conflict-minerals/</a>.

#### **Results of Due Diligence**

For the 2018 reporting period, we had reason to believe that the Conflict Minerals contained in the Intuit Payment Devices may have originated from the Covered Countries and may not have come from recycled or scrap sources. Intuit exercised vigilant due diligence as described above, on the source and chain of custody of these necessary Conflict Minerals.

Intuit's efforts to determine the mine or location of origin of the Conflict Minerals in the Intuit Payment Devices with the greatest possible specificity consisted of the due diligence measures described in this CMR, including our efforts to seek information from our suppliers using the Template. Based on responses we received from our Tier One Supplier, 153 smelters were identified in Intuit's supply chain. All of the identified smelters have been audited by the RMAP.

The table below illustrates our results by providing, for each relevant metal, the number and percentage of identified 3TG smelters that were RMAP compliant.

| <b>Conflict Minerals</b> | Total Smelters in<br>Supply Chain | Total RMAP -<br>Compliant Smelters | % of RMAP-<br>Compliant Smelters |
|--------------------------|-----------------------------------|------------------------------------|----------------------------------|
| Gold                     | 63                                | 63                                 | 100                              |
| Tantalum                 | 26                                | 26                                 | 100                              |
| Tin                      | 43                                | 42                                 | 98                               |
| Tungsten                 | 21                                | 21                                 | 100                              |
| Grand total              | 153                               | 152                                | 99                               |

Last year, we disclosed in our CMR that 94% of the identified smelters were RMAP compliant. There is a considerable increase in percentage of RMAP compliant smelters in this year's CMR which confirms our commitment to the Conflict Minerals Rules. One of the tin smelters did not appear on the RMAP compliant smelters list since they shut down their operations. The table above reflects as such.

Additionally, Intuit cannot be certain that the list of 153 smelters is comprehensive and that there are no other smelters which contribute to the component in Intuit's Payment Devices. Consequently, we are unable to determine that the Conflict Minerals utilized in the Intuit Payment Devices did not originate in the Covered Countries or directly or indirectly benefit armed groups.

Although Intuit requested information from the suppliers at a product level, almost all supplier responses provided information at a company or division level, but not at a product level, and, therefore, the information provided was not necessarily limited to smelters confirmed to be in Intuit's supply chain. As a result, Intuit is unable to validate whether the facilities identified by the OEMs, which are listed in Annex A below, in fact contributed Conflict Minerals to Intuit Payment Devices. Annex B below includes an aggregated list of the countries of origin from which the facilities listed in Annex A are believed to source Conflict Minerals, based on information provided by suppliers and RMI, of which Intuit is a member.

#### **Additional Mitigation Efforts**

Intuit is committed to responsible sourcing and has been dedicate to ensuring that any Conflict Minerals contained in its products do not finance armed group. Towards this end, Intuit has made notable progress in ensuring that Conflict Minerals are sourced from conflict-free smelters.

Intuit is also a member of the RBA and has developed procedures consistent with the RBA recommendations for responsible sourcing of Conflict Minerals, as set forth in the OECD Guidance. Intuit also attends the bi-weekly RBA Conflict Minerals Due Diligence Calls chaired by the RBA and has implemented the best practices that are relevant to its supply chain that have been developed by the RMI. As an active member of the RBA, Intuit will continue to monitor and implement relevant best practices recommendations from the RBA as well as Conflict Minerals trends that impact Intuit's business.

#### Further Intuit:

- While on-boarding our Tier One Supplier, included a provision in the supplier contract to ensure that it is committed to responsible sourcing of Conflict Minerals;
- Conducts benchmarking sessions with manufacturers and other technology companies in Silicon Valley;
- Sets up webinars with its suppliers to address concerns and questions; and
- Continues to work with suppliers to see that they have robust due diligence practices.

We also continue to work with our Tier One Supplier and the RBA to ensure that our Tier One Supplier continue to make all reasonable efforts to work with OEMs to source from smelters that are compliant with the RMAP.

Finally, while we are pleased with our progress in developing a conflict-free supply chain of Conflict Minerals in our existing products, we may continue to introduce new products, including devices which may contain certain Conflict Minerals necessary to their functionality or production. To that extent, we will continue to take all reasonable efforts to source such Conflict Minerals from smelters that are compliant with the RMAP.

# ANNEX A

# 2018 Facility List

The following is a list of the facilities that the suppliers we surveyed reported as being in their supply chains.

| Mineral  | Smelter Name  | Country                          |
|----------|---|----------------------------------|
| Tungsten | A.L.M.T. TUNGSTEN Corp.                                   | JAPAN                            |
| Tungsten | Chenzhou Diamond Tungsten Products Co., Ltd.              | CHINA                            |
| Tungsten | Chongyi Zhangyuan Tungsten Co., Ltd.                      | CHINA                            |
| Tungsten | Fujian Jinxin Tungsten Co., Ltd.                          | CHINA                            |
| Tungsten | Global Tungsten & Powders Corp.                           | UNITED STATES OF AMERICA         |
| Tungsten | Ganzhou Jiangwu Ferrotungsten Co., Ltd.                   | CHINA                            |
| Tungsten | Guangdong Xianglu Tungsten Co., Ltd.                      | CHINA                            |
| Tungsten | Ganzhou Huaxing Tungsten Products Co., Ltd.               | CHINA                            |
| Tungsten | H.C. Starck Tungsten GmbH                                 | GERMANY                          |
| Tungsten | H.C. Starck Smelting GmbH & Co. KG                        | GERMANY                          |
| Tungsten | Hunan Chenzhou Mining Co., Ltd.                           | CHINA                            |
| Tungsten | Hydrometallurg, JSC                                       | RUSSIAN FEDERATION               |
| Tungsten | Japan New Metals Co., Ltd.                                | JAPAN                            |
| Tungsten | Jiangxi Xinsheng Tungsten Industry Co., Ltd.              | CHINA                            |
| Tungsten | Kennametal Huntsville                                     | UNITED STATES OF AMERICA         |
| Tungsten | Kennametal Fallon   | UNITED STATES OF AMERICA         |
| Tungsten | Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC | VIET NAM                         |
| Tungsten | Tejing (Vietnam) Tungsten Co., Ltd.                       | VIET NAM                         |
| Tungsten | Wolfram Bergbau und Hutten AG                             | AUSTRIA                          |
| Tungsten | Xiamen Tungsten Co., Ltd.                                 | CHINA                            |
| Tungsten | Xiamen Tungsten (H.C.) Co., Ltd.                          | CHINA                            |
| Tin      | Alpha   | UNITED STATES OF AMERICA         |
| Tin      | Jiangxi Ketai Advanced Material Co., Ltd.                 | CHINA                            |
| Tin      | China Tin Group Co., Ltd.                                 | CHINA                            |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.             | CHINA                            |
| Tin      | Yunnan Tin Company Limited                                | CHINA                            |
| Tin      | CV Gita Pesona  | INDONESIA                        |
| Tin      | PT Aries Kencana Sejahtera                                | INDONESIA                        |
| Tin      | PT Premium Tin Indonesia                                  | INDONESIA                        |
| Tin      | CV United Smelting  | INDONESIA                        |
| Tin      | Dowa  | JAPAN                            |
| Tin      | EM Vinto  | BOLIVIA (PLURINATIONAL STATE OF) |
| Tin      | Fenix Metals  | POLAND                           |
| Tin      | Gejiu Kai Meng Industry and Trade LLC                     | CHINA                            |
| Tin      | Gejiu Non-Ferrous Metal Processing Co., Ltd.              | CHINA                            |
| Tin      | Huichang Jinshunda Tin Co., Ltd.                          | CHINA                            |
| Tin      | Magnu's Minerais Metais e Ligas Ltda.                     | BRAZIL                           |
| Tin      | Malaysia Smelting Corporation (MSC)                       | MALAYSIA                         |
| Tin      | Melt Metais e Ligas S.A.                                  | BRAZIL                           |

| Tin      | Mineracao Taboca S.A.                             | BRAZIL                              |
|----------|---|-------------------------------------|
| Tin      | Mitsubishi Materials Corporation                  | JAPAN                               |
| Tin      | O.M. Manufacturing (Thailand) Co., Ltd.           | THAILAND                            |
| Tin      | O.M. Manufacturing Philippines, Inc.              | PHILIPPINES                         |
| Tin      | Operaciones Metalurgical S.A.                     | BOLIVIA (PLURINATIONAL<br>STATE OF) |
| Tin      | CV Ayi Jaya                                       | INDONESIA                           |
| Tin      | PT Aries Kencana Sejahtera                        | INDONESIA                           |
| Tin      | PT ATD Makmur Mandiri Jaya                        | INDONESIA                           |
| Tin      | PT Bukit Timah                                    | INDONESIA                           |
| Tin      | PT DS Jaya Abadi                                  | INDONESIA                           |
| Tin      | PT Inti Stania Prima                              | INDONESIA                           |
| Tin      | PT Karimun Mining                                 | INDONESIA                           |
| Tin      | PT Mitra Stania Prima                             | INDONESIA                           |
| Tin      | PT Panca Mega Persada                             | INDONESIA                           |
| Tin      | PT Prima Timah Utama                              | INDONESIA                           |
| Tin      | PT Refined Bangka Tin                             | INDONESIA                           |
| Tin      | PT Sumber Jaya Indah                              | INDONESIA                           |
| Tin      | PT Timah (Persero) Tbk Kundur                     | INDONESIA                           |
| Tin      | PT Timah (Persero) Tbk Mentok                     | INDONESIA                           |
| Tin      | Rui Da Hung                                       | TAIWAN, PROVINCE OF<br>CHINA        |
| Tin      | Soft Metais Ltda.                                 | BRAZIL                              |
| Tin      | Thaisarco   | THAILAND                            |
| Tin      | White Solder Metalurgia e Mineracao Ltda.         | BRAZIL                              |
| Tin      | Yunnan Chengfeng Non-ferrous Metals Co., Ltd.     | CHINA                               |
| Tin      | Yunnan Tin Company Limited                        | CHINA                               |
| Tantalum | Changsha South Tantalum Niobium Co., Ltd.         | CHINA                               |
| Tantalum | Exotech Inc.                                      | UNITED STATES OF AMERICA            |
| Tantalum | F&X Electro-Materials Ltd.                        | CHINA                               |
| Tantalum | Global Advanced Metals Boyertown                  | UNITED STATES OF AMERICA            |
| Tantalum | Global Advanced Metals Aizu                       | JAPAN                               |
| Tantalum | Guangdong Zhiyuan New Material Co., Ltd.          | CHINA                               |
| Tantalum | H.C. Starck Co., Ltd.                             | THAILAND                            |
| Tantalum | H.C. Starck Tantalum and Niobium GmbH             | GERMANY                             |
| Tantalum | H.C. Starck Hermsdorf GmbH                        | GERMANY                             |
| Tantalum | H.C. Starck Inc.                                  | UNITED STATES OF AMERICA            |
| Tantalum | H.C. Starck Smelting GmbH & Co. KG                | GERMANY                             |
| Tantalum | Hengyang King Xing Lifeng New Materials Co., Ltd. | CHINA                               |
| Tantalum | JiuJiang JinXin Nonferrous Metals Co., Ltd.       | CHINA                               |
| Tantalum | Jiujiang Tanbre Co., Ltd.                         | CHINA                               |
| Tantalum | KEMET Blue Metals                                 | MEXICO                              |
| Tantalum | LSM Brasil S.A.                                   | BRAZIL                              |
| Tantalum | Mineracao Taboca S.A.                             | BRAZIL                              |
| Tantalum | Mitsui Mining and Smelting Co., Ltd.              | JAPAN                               |
| Tantalum | Metallurgical Products India Pvt., Ltd.           | INDIA                               |
| Tantalum | NPM Silmet AS                                     | ESTONIA                             |
|          |   |                                     |

| Tantalum | Ningxia Orient Tantalum Industry Co., Ltd.                                    | CHINA                    |
|----------|---|--------------------------|
| Tantalum | QuantumClean  | UNITED STATES OF AMERICA |
| Tantalum | RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd. | CHINA                    |
| Tantalum | Solikamsk Magnesium Works OAO   | RUSSIAN FEDERATION       |
| Tantalum | Taki Chemical Co., Ltd.   | JAPAN                    |
| Tantalum | Telex Metals  | UNITED STATES OF AMERICA |
| Gold     | Aida Chemical Industries Co., Ltd.  | JAPAN                    |
| Gold     | Allgemeine Gold-und Silberscheideanstalt A.G.                                 | GERMANY                  |
| Gold     | AngloGold Ashanti Corrego do Sitio Mineracao                                  | BRAZIL                   |
| Gold     | Argor-Heraeus S.A.  | SWITZERLAND              |
| Gold     | Asahi Pretec Corp.  | JAPAN                    |
| Gold     | Asahi Refining Canada Ltd.  | CANADA                   |
| Gold     | Asahi Refining USA Inc.   | UNITED STATES OF AMERICA |
| Gold     | Asaka Riken Co., Ltd.   | JAPAN                    |
| Gold     | Aurubis AG  | GERMANY                  |
| Gold     | Bangko Sentral ng Pilipinas (Central Bank of the Philippines)                 | PHILIPPINES              |
| Gold     | CCR Refinery - Glencore Canada Corporation                                    | CANADA                   |
| Gold     | Cendres + Metaux S.A.   | SWITZERLAND              |
| Gold     | Chimet S.p.A.   | ITALY                    |
| Gold     | Daejin Indus Co., Ltd.  | KOREA, REPUBLIC OF       |
| Gold     | DSC (Do Sung Corporation)   | KOREA, REPUBLIC OF       |
| Gold     | DODUCO Contacts and Refining GmbH   | GERMANY                  |
| Gold     | Dowa  | JAPAN                    |
| Gold     | Eco-System Recycling Co., Ltd.  | JAPAN                    |
| Gold     | Heraeus Metals Hong Kong Ltd.   | CHINA                    |
| Gold     | Heraeus Precious Metals GmbH & Co. KG   | GERMANY                  |
| Gold     | Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.               | CHINA                    |
| Gold     | Ishifuku Metal Industry Co., Ltd.   | JAPAN                    |
| Gold     | Istanbul Gold Refinery  | TURKEY                   |
| Gold     | Japan Mint  | JAPAN                    |
| Gold     | Jiangxi Copper Co., Ltd.  | CHINA                    |
| Gold     | JSC Uralelectromed  | RUSSIAN FEDERATION       |
| Gold     | JX Nippon Mining & Metals Co., Ltd.   | JAPAN                    |
| Gold     | Kazzinc   | KAZAKHSTAN               |
| Gold     | Kennecott Utah Copper LLC   | UNITED STATES OF AMERICA |
| Gold     | Kojima Chemicals Co., Ltd.  | JAPAN                    |
| Gold     | Matsuda Sangyo Co., Ltd.  | JAPAN                    |
| Gold     | Metalor Technologies (Hong Kong) Ltd.   | CHINA                    |
| Gold     | Metalor Technologies (Singapore) Pte., Ltd.                                   | SINGAPORE                |
| Gold     | Metalor Technologies S.A.   | SWITZERLAND              |
| Gold     | Metalor USA Refining Corporation  | UNITED STATES OF AMERICA |
| Gold     | Metalurgica Met-Mex Penoles S.A. De C.V.                                      | MEXICO                   |
| Gold     | Mitsubishi Materials Corporation  | JAPAN                    |
| Gold     | Moscow Special Alloys Processing Plant  | RUSSIAN FEDERATION       |
| Gold     | Nadir Metal Rafineri San. Ve Tic. A.S.  | TURKEY                   |
|          |   |                          |

| Gold | Nihon Material Co., Ltd.  | JAPAN                        |
|------|---|------------------------------|
| Gold | Ohura Precious Metal Industry Co., Ltd.                                     | JAPAN                        |
| Gold | OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet) | RUSSIAN FEDERATION           |
| Gold | PAMP S.A.   | SWITZERLAND                  |
| Gold | PX Precinox S.A.  | SWITZERLAND                  |
| Gold | Royal Canadian Mint   | CANADA                       |
| Gold | Samduck Precious Metals   | KOREA, REPUBLIC OF           |
| Gold | SEMPSA Joyeria Plateria S.A.  | SPAIN                        |
| Gold | Shandong Zhaojin Gold & Silver Refinery Co., Ltd.                           | CHINA                        |
| Gold | SOE Shyolkovsky Factory of Secondary Precious Metals                        | RUSSIAN FEDERATION           |
| Gold | Solar Applied Materials Technology Corp.                                    | TAIWAN, PROVINCE OF<br>CHINA |
| Gold | Sumitomo Metal Mining Co., Ltd.   | JAPAN                        |
| Gold | Tanaka Kikinzoku Kogyo K.K.   | JAPAN                        |
| Gold | The Refinery of Shandong Gold Mining Co., Ltd.                              | CHINA                        |
| Gold | Umicore S.A. Business Unit Precious Metals Refining                         | BELGIUM                      |
| Gold | Umicore Precious Metals Thailand  | THAILAND                     |
| Gold | United Precious Metal Refining, Inc.  | UNITED STATES OF AMERICA     |
| Gold | Valcambi S.A.   | SWITZERLAND                  |
| Gold | Western Australian Mint (T/a The Perth Mint)                                | AUSTRALIA                    |
| Gold | CCR Refinery - Glencore Canada Corporation                                  | CANADA                       |
| Gold | Yamakin Co., Ltd.   | JAPAN                        |
| Gold | Yokohama Metal Co., Ltd.  | JAPAN                        |
| Gold | Zhongyuan Gold Smelter of Zhongjin Gold Corporation                         | CHINA                        |
| Gold | Gold Refinery of Zijin Mining Group Co., Ltd.                               | CHINA                        |

# ANNEX B

Countries of origin of the Conflict Minerals that the facilities listed in Annex A process are believed to include the following countries, based on information provided by suppliers and RMI:

| Level 1 countries are not identified as conflict regions or plausible areas of smuggling or export from the DRC and its nine adjoining countries.  Australia Austria Belgium Bolivia Brazil Canada China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America Vietnam  Level 2 countries are known or plausible countries for smuggling, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing, export out of region or transit of materials containing tantalum, tin,  It was it of materials containing tantalum, tin,  It was it of materials containing tantalum, tin,  It ungsten or gold.  Level 2 countries are known or plausible countries for smuggling, export out of region or transit of materials containing tantalum, tin,  It ungsten or gold. | L1  | L2  |
|---|---|---|
| Austria Belgium Bolivia Brazil Canada China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | regions or plausible areas of smuggling or export | countries for smuggling, export out of region or transit of materials containing tantalum, tin, |
| Belgium Bolivia Brazil Canada China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Australia   |   |
| Bolivia Brazil Canada China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Austria   |   |
| Brazil Canada China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Belgium   |   |
| Canada China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Bolivia   |   |
| China Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Brazil  |   |
| Estonia Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Canada  |   |
| Germany Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | China   |   |
| Hong Kong India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Estonia   |   |
| India Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Germany   |   |
| Indonesia Italy Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Hong Kong   |   |
| Italy Japan  Kazakhstan  Korea  Malaysia  Mexico  Philippines  Poland  Russia  Singapore  Spain  Sweden  Switzerland  Taiwan  Thailand  Turkey  United States of America  | India   |   |
| Japan Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Indonesia   |   |
| Kazakhstan Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Italy   |   |
| Korea Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Japan   |   |
| Malaysia Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Kazakhstan  |   |
| Mexico Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Korea   |   |
| Philippines Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Malaysia  |   |
| Poland Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Mexico  |   |
| Russia Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America   | Philippines                                       |   |
| Singapore Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Poland  |   |
| Spain Sweden Switzerland Taiwan Thailand Turkey United States of America  | Russia  |   |
| Sweden Switzerland Taiwan Thailand Turkey United States of America  | Singapore   |   |
| Switzerland Taiwan Thailand Turkey United States of America   | Spain   |   |
| Taiwan Thailand Turkey United States of America   | Sweden  |   |
| Thailand Turkey United States of America  | Switzerland                                       |   |
| Turkey United States of America   | Taiwan  |   |
| United States of America  | Thailand  | 1   |
|   | Turkey  | 1   |
| Vietnam   | United States of America                          | 1   |
|   | Vietnam   |   |